

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
BRIAN PUGH
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Brian_Pugh@fd.org

6 Attorney for Robert Guy Russell
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ROBERT GUY RUSSELL,

14 Defendant.
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Case No. 2:20-cr-00059-APG-DJA

**STIPULATION TO CONTINUE
SENTENCING**
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
17 Acting United States Attorney, and Simon F. Kung, Assistant United States Attorney, counsel
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian
19 Pugh, Assistant Federal Public Defender, counsel for Robert Guy Russell, that the Sentencing
20 Hearing currently scheduled on June 1, 2021 at 10:30 am, be vacated and continued to a date
21 and time convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defense is preparing a mitigation video and needs additional time to
24 investigate, video witnesses, and prepare the video.
25 2. The defense continues to work with Probation to gather documents to assist
26 Probation in the preparation of the presentence investigation report.

1 3. Defendant is not incarcerated and does not object to a continuance.

2 4. The parties agree to the continuance.

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4 This is the second request for continuance filed herein.

5 DATED this 16th day of April 2021.

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7 RENE L. VALLADARES
8 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

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10 By /s/ Brian Pugh

11 BRIAN PUGH
12 Assistant Federal Public Defender

 By /s/ Simon F. Kung

 SIMON F. KUNG
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROBERT GUY RUSSELL,

7 Defendant.

Case No. 2:20-cr-00059-APG-DJA

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Sentencing Hearing currently scheduled on June
12 1, 2021 at the hour of 10:30 a.m., be vacated and continued to August 5, 2021 at the hour of
13 9:30 a.m. in Courtroom 6C.

14 DATED this 19th day of April 2021.

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17 UNITED STATES DISTRICT JUDGE
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